

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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**IN RE MOTION TO COMPEL  
COMPLIANCE WITH RULE 45  
SUBPOENA ISSUED TO ETHICARE  
ADVISORS, INC.**

Case No. 2:20-cv-01886-WJM-MF

**APPLICATION FOR  
EXTENSION OF TIME TO  
RESPOND (L. CIV. R. 6.1(b))**

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TO THE CLERK OF COURT:

Respondent Ethicare Advisors, Inc. (“Ethicare” or “Respondent”) submits this application for an extension to file a response to Plaintiffs’ motion to compel on or before March 16, 2020, and represents that:

1. On February 21, 2020, Plaintiffs/Applicants Star Dialysis, LLC, Ordust Dialysis, LLC, Routt Dialysis, LLC, Panther Dialysis, LLC, and DaVita Inc. (collectively, “Plaintiffs” or “DaVita”) filed a motion in this Court seeking to compel Ethicare to produce documents pursuant to a Subpoena.

2. Service of Plaintiffs’ motion to compel upon Ethicare’s counsel occurred on February 24, 2020.

3. Ethicare requests an extension pursuant to L. Civ. R. 6.1(b), which permits a respondent to seek a 14-day extension of a response date upon application to the Clerk.<sup>1</sup>

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<sup>1</sup> Local Rule 6.1(b) provides: “The time within which to answer or reply to any pleading as to which a responsive

4. The present motion date assigned to Plaintiffs' motion to compel is March 16, 2020.

5. The within application is being made prior to the assigned response date, as the existing date for Respondent to file an opposition is March 2, 2020.

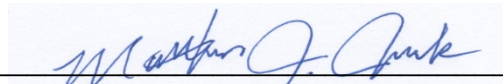
6. No previous extension has been requested/obtained by Respondent.

7. Plaintiff's counsel has consented to this request for an extension for the filing of a response on or before March 16, 2020.

Accordingly, EthiCare respectfully requests that the Court accept this request and extend the time to file a response to March 16, 2020.

Dated: February 25, 2020

Respectfully submitted,



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pleading is permitted may, before the expiration of the original deadline to answer or reply thereto, and with or without notice, be extended once for a period not to exceed 14 days on order granted by the Clerk. Any other proposed extension of time must be presented to the Court for consideration."